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SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415

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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF PUBLIC UTILITY COMMISSION
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS
FILING CLERK

**CITIES ADVOCATING REASONABLE DEREGULATION'S
SEVENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Seventh Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) calendar days of service hereof or no later than **March 2, 2021**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

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5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

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By: /s/Brennan Foley

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**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of February, 2021, a true and correct copy of CARD's *Seventh Set of Requests for Information to SWEPCO* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/Leslie Lindsey

Leslie Lindsey

EXHIBIT A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**CITIES ADVOCATING REASONABLE DEREGULATION'S
SEVENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 7-1. Please provide the current planned retirement date of each SWEPCO generating unit.
- 7-2. Please provide SWEPCO's most recent economic analysis supporting the current planned retirement date of each of SWEPCO's coal- and lignite-fired generating units, including workpapers with calculations and underlying assumptions.
- 7-3. Please provide SWEPCO's two most recent economic analyses supporting the decision to operate each of SWEPCO's coal- and lignite-fired generating units during the test year for this case, including workpapers with calculations and underlying assumptions.
- 7-4. Please provide SWEPCO's three most recent Integrated Resource Plan (IRP) reports.
- 7-5. Please provide the nameplate capacity (MW), and firm capacity (MW) used for SWEPCO's planning purposes, contract start date, and expected contract end date for each SWEPCO renewable energy purchased power agreement in effect during the test year in this case.
- 7-6. Please provide SWEPCO's current estimate of purchased capacity prices (\$/KW-month or year) as used for the Company's most recent IRP.
- 7-7. Please provide SWEPCO's current estimate of purchased capacity prices (\$/KW-month or year) based on price bids received and/or reviewed by the Company within the last two years.
- 7-8. Please provide the SWEPCO's current estimate of new generation capacity costs (\$/KW-month or year) based on each new conventional or renewable generation resource alternative evaluated in the Company's most recent IRP.
- 7-9. Please identify any imputed capacity costs and the associated supply resource (owned or PPA) included in SWEPCO's base rates during the test year.
- 7-10. Please provide the project description, in-service date, project cost, and cost/benefit analysis supporting each capital project at Dolet Hills that has a cost above \$2 million and which is being requested by SWEPCO in rate base for the first time in this case.

- 7-11. Please provide the project description, in-service date, project cost, and cost/benefit analysis supporting each capital project at Pirkey that has a cost above \$2 million and which is being requested by SWEPCO in rate base for the first time in this case.
- 7-12. Please provide the economic analysis along with supporting calculations and assumptions supporting the planned early retirement of the Dolet Hills plant, and identify any non-economic factors that were primary factors in the retirement decision.
- 7-13. Please provide documentation provided to SWEPCO senior management to support the planned early retirement of the Dolet Hills plant, along with date of this decision.
- 7-14. Please describe and provide the amount of any proposed adjustments to test year costs included in this case to reflect the planned early retirement of the Dolet Hills plant.
- 7-15. Please provide the economic analysis along with supporting calculations and assumptions supporting the recently announced planned early retirement of the Pirkey plant, and identify any non-economic factors that were primary factors in the early retirement decision.
- 7-16. Please provide documentation provided to SWEPCO senior management to support the recently planned early retirement of the Pirkey plant, along with date of this decision.
- 7-17. Please describe and provide the amount of any proposed adjustments to test year costs included in this case to reflect the planned early retirement or reduced future operations of the Pirkey plant.
- 7-18. Please explain why SWEPCO is proposing to continue operating the Pirkey plant through 2023 rather than immediately retiring the plant.
- 7-19. Please describe and provide documentation of any efforts by SWEPCO to mitigate the Company's share of fixed fuel or capital costs of Dolet Hills that are expected to be unrecovered as of the date of retirement of the plant.
- 7-20. Please identify any differences between SWEPCO's proposed ratemaking treatment of Dolet Hills retirement costs (including any un-recovered investment) and the Commission-approved ratemaking treatment of retirement costs associated with Welsh 2.
- 7-21. Please identify any differences between SWEPCO's proposed ratemaking treatment of Dolet Hills retirement costs (including any un-recovered investment) and the Commission-approved ratemaking treatment of retirement costs associated with Welsh 2 in other (i.e., non-Texas) jurisdictions.
- 7-22. Please explain why SWEPCO believes that the Commission should approve a different ratemaking treatment of Dolet Hills retirement costs (including any un-recovered investment) than was approved by the Commission for Welsh 2.

- 7-23. Please provide any economic studies provided by SWEPCO within the last three calendar years in other regulatory jurisdictions addressing the planned retirement or economic viability of continued operations of the Pirkey, Dolet Hills, Welsh or Flint Creek plants.
- 7-24. Please provide the total test year cost of each SPP non-energy ancillary service purchased by SWEPCO during the test year that is not recovered through the Company's base rates.
- 7-25. Please provide the total test year revenue for each SPP non-energy ancillary service sold by SWEPCO during the test year, that is not recovered through the Company's base rates.
- 7-26. Please provide the volume (tons) and associated dollar value of coal inventory requested by SWEPCO in rates in this case for each coal plant.
- 7-27. Please provide SWEPCO's current coal inventory target (tons and days burn) along with supporting analysis and assumptions for each coal plant.
- 7-28. Please provide the average daily coal burn (tons) for each SWEPCO coal-fired generating unit for the test year, 2017, 2018, and as currently forecasted for 2021, 2022 and 2023.
- 7-29. Please provide the volume (tons) and associated dollar value of lignite inventory requested by SWEPCO in rates in this case for Pirkey and for Dolet Hills.
- 7-30. Please provide SWEPCO's current lignite inventory target (tons and days burn) along with supporting analysis and assumptions for Pirkey and for Dolet Hills.
- 7-31. Please provide the average daily lignite burn (tons) for SWEPCO's share of Pirkey and Dolet Hills for the test year, 2017, 2018, and as currently forecasted for 2021, 2022 and 2023.